

July 20, 2017

Ms. Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Technology Transitions, GN Docket No. 13-5
Restoring Internet Freedom, WC Docket No. 17-108
Accelerating Wireline Broadband Deployment by Removing Barriers to
Infrastructure Investment, WC Docket No. 17-84
Accelerating Wireless Broadband Deployment by Removing Barriers to
Infrastructure Investment, WT Docket No. 17-79
Connect America Fund, WC Docket No. 10-90
Universal Service Reform - Mobility Fund, WT Docket No. 10-208
Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42
Telecommunications Carriers Eligible for Universal Service Support,
WC Docket No. 09-197

Dear Ms. Dortch:

On July 18, 2017, county commissioners and administrators from seven counties in West Virginia - Calhoun County, Pleasants County, Wetzel County, Wood County, Tyler County, Roane County, and Ritchie County - along with Kate Forsey, Associate Policy Counsel from Public Knowledge, met together with Commissioner Mignon Clyburn and Chief of Staff to the Commissioner David Grossman as part of the Appalachian Connectivity Summit in Marietta Ohio to discuss the systemic problems with communications networks that continue to devastate West Virginia communities. A full list of attendees names is attached to this submission.

Each county delegation spoke on behalf of that county alone, and the details of their concerns are detailed by county below. However, several themes emerged during the conversation which are important to highlight. They include a lack of reliability on legacy telephone networks; emergency services downed for extended periods of time; negative effects on primary and secondary education; the impact lack of access has on families with disabilities; the inability for small businesses to flourish and impact on the local economy; and, where access exists, the unaffordability of those services, misrepresentation of actual service speed versus what was advertised, and lack of choice and competition.

Calhoun County

Commissioners from Calhoun County expressed their dissatisfaction with their sole Internet provider, Frontier, and its limited service coverage throughout the county. They emphasized the dangerous and life-threatening impacts poor coverage and frequent outages have on their communities. In

particular, they described a recent example where there was a 24-hour disruption in telephone and internet service that blacked out service completely. Only individuals with cell phone reception, which is itself sparse and unreliable, were able to call 911, which routed to a 911 call center a county over. 911 dispatchers in the neighboring county would then radio to Calhoun County's actual call center in order to dispatch emergency responders. Thousands of people could not get dial tones on any service. One day after service returned, a similar disruption affected another 6,000 residents. Landlines in Calhoun County are so bad that communities set up "daisy chain" networks of people to check on loved ones who are sick or elderly, because LifeAlerts do not operate.

The prices for services are also too high. One cable and internet bundle is about \$50/month. To include a landline - a necessity when so many services are consistently unreliable - the price is approximately \$110/month, and most subscribers still have frequent problems with latency.

This poor and inconsistent service stifles economic growth in the county. Calhoun exists in what they describe as a "donut hole", with no four-lane roads, no trains, and no navigable water. They have been told that their key economic hope is high-speed internet. Calhoun needs high-speed internet that is reliable and affordable, and at least decent landline service so that businesses will be attracted to grow the economy of West Virginia.

Ritchie County

Representatives from Ritchie County expressed concerns about negative impacts lack of service has on economic growth in their region. Ritchie County is a draw for many people from around the country who would like to retire or leave larger cities for a more relaxed pace of life. It is also home to many who would like to start their own businesses. An influx of retirees and entrepreneurs would be a boon to the economic growth of the community. However, the challenges from the lack of technology and lack of digital infrastructure are suppressing growth and economic opportunity in the county. Those challenges are made harder by the cuts to local, county, and federal budgets for broadband deployment.

Roane County

There is no broadband service in Roane County, as it is defined by the FCC. Any time it rains in Roane County, there are landline service outages across the county. The only consistency is the routine lack of service due to dilapidated infrastructure that service providers fail to properly maintain or fix as needed when trees down lines or flooded streams wash them out. Maintenance requests are usually met with temporary fixes. These "fixes" are typically the cheapest option available to the service provider - sometimes providers address frayed or exposed lines by wrapping them in electrical tape. Requests for basic maintenance often not responded to until the public service commission files a complaint. Service companies also frequently charge customers for repairs on neglected or downed lines. As a result, many residents are reluctant to complain or request service because they do not want to be charged. Frontier has promised to address these issues in a more sustainable manner, but has failed to show any action. County commissioners urged the FCC to help them get federal funding so that they can address issues themselves. A letter from the Roane County commissioners addressed to Commissioner Clyburn is attached.

Tyler County

Tyler County's concerns include unaffordable service, lack of access to education resources, and lack of reliable access to emergency and public safety services. Although the county has better access to broadband than many others in the region, a DSL/satellite connection through HughesNet is prohibitively expensive for many families, reaching around \$100/month. Children in the county are unable to do their homework anywhere but at their school, and many live far away. The service is also unreliable for first responders, who frequently find themselves in "holes" where ambulances cannot deliver data to the hospital. When it rains, all connectivity on landlines and internet typically goes dark.

Pleasants County

Pleasants County has some manageable service via Suddenlink and Frontier, but there are large swaths of dead zones throughout the county. The negative effects on student are enormous. One assistant principal often sleeps overnight at the school because students have to stay to do their homework, since they have no service at home.

Wireless coverage is also sparse. Although there is a tower assistance fund to for grants to build towers, AT&T and other providers have neglected to put the necessary equipment onto the towers because they insist there is no business case. Commissioners from Pleasant County urge the FCC to have service providers put equipment on the towers the county has built. Further, while CAF is useful, funding often does not go to the areas with the greatest need due to how the census blocks have been set up. Pleasants County Commissioners urged the FCC to rethink how the blocks are drawn so that the funding can go the places that need it but are currently overlooked.

Wetzel County

Commissioners are concerned about the problems lack of service has on their county's students. Many young people live far out in the county and would like to be able to take online classes or at least complete their homework at home. Online and traditional brick-and-mortar business find it difficult to complete basic functions with unreliable internet service, let alone compete on a broader scale and expand their businesses. Wetzel County commissioned a survey of its residents' experiences and frustrations with their services and providers. The general consensus of participants was overwhelming dissatisfaction and frustration with slow speeds or lack of service entirely. The full survey is attached, with personal information redacted.

Wood County

The representative from Wood County described "many horror stories" of residents whose cell phone service has failed at critical moments of public safety. There is also frustration in the county, shared by many other counties, about "dark fiber," fiber that has been laid underneath areas but goes unused, failing to serve the many communities it could easily connect. They urged the FCC to help them find ways to connect the fiber already there, particularly where it is clear that there is no immediate intent by the companies who own the pipes to do so.

Commissioners from the above counties brought these stories from their residents to implore the FCC to aid their community efforts to improve broadband and landline access, speed, reliability, and affordability in West Virginia. The data currently used by the FCC clearly does not reflect the actual experiences of residents in these counties. Improving broadband in West Virginia and across Appalachia is an absolute necessity for public safety, economic growth, education opportunities, and improved quality of life in the region. It is a matter of life and death.

In accordance with Section 1.1206(b) of the Commission's rules, an electronic copy of this letter is being filed in the above-referenced docket. Please contact me with any questions regarding this filing.

Sincerely,

Kate Forscey
Associate Policy Counsel
Public Knowledge

Cc: Commissioner Mignon Clyburn
cc: David Grossman

Attachment: Full List of Attendees by Name and Title